

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No.: 15-27622
Judge: Beth E. Hanan
Chapter: Chapter 13

**In Re: Adrian Buckley
Nicole Buckley**

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Geraci Law, LLC, Attorneys for the Debtors, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, on or before 21 days from the date of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk, U.S. Bankruptcy Court
517 E. Wisconsin Ave., Rm. 126
Milwaukee, WI 53202

If you mail your request or response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the parties listed below and on the attached mailing matrix:

Felicia Marie Petroff
Geraci Law, LLC
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (414) 475-6052
Fax: (877) 247-1960
Email: wal@geracilaw.com

United States Trustee
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 430
Milwaukee, WI 53202

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Geraci Law, LLC
Felicia Marie Petroff
2505 N. Mayfair Rd. #101
Wauwatosa, WI 53226

Adrian Buckley
Nicole Buckley
4836 N. 66th St.
Milwaukee, WI 53218

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponents of this modification are the Debtors, through their Attorneys, Geraci Law, LLC.
2. This is a request to modify a Chapter 13 Plan (Select A. or B.):
 - A. _____ post-confirmation
 - B. X pre-confirmation (Select i. or ii.):
 - i. _____ Debtor/Debtor's attorney certifies that the proposed modification does not materially or adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
 - ii. X Debtors/Debtors' attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors are (See Attached List).
3. The Proponents wish to modify the Chapter 13 Plan to do the following: See Below.
4. The reason for the modification is to make the Plan feasible.

5. Select A. or B.

A. _____ The confirmed Chapter 13 Plan is modified as follows:

B. X The unconfirmed Chapter 13 Plan is modified as follows: Allowed general unsecured claims shall receive a pro rata share of not less than \$16,313.

C. All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.

WHEREFORE, the Proponents request that the Court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Wednesday, December 09, 2015.

By: /s/ Felicia Marie Petroff
Felicia Marie Petroff
Attorney for Debtor
Bar #: 1066358

Felicia Marie Petroff
Geraci Law, LLC
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (414) 475-6052
Fax: (877) 247-1960
Email: wal@geracilaw.com

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Case No.: 15-27622
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Chapter: Chapter 13

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CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Wednesday, December 09, 2015:

Adrian Buckley
Nicole Buckley
4836 N. 66th St.
Milwaukee, WI 53218

See Attached List

Additionally, the documents referenced above were also served via electronic means on the following individuals on Wednesday, December 09, 2015:

United States Trustee
Eastern District of Wisconsin
517 E. Wisconsin Ave.
Milwaukee, WI 53202

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Dated this Wednesday, December 09, 2015.

By: /s/ Felicia Marie Petroff
Felicia Marie Petroff
Attorney of the Debtor
Bar #: 1066358

Felicia Marie Petroff
Geraci Law, LLC
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (414) 475-6052
Fax: (877) 247-1960
Email: wal@geracilaw.com

Label Matrix for local noticing
0757-2
Case 15-27622-beh
Eastern District of Wisconsin
Milwaukee
Wed Dec 9 10:07:16 CST 2015

Alliance Collection AG
Attn: Bankruptcy Dept.
3916 S Business Park Ave
Marshfield,WI 54449-9029

Anytime Fitness
Bankruptcy Notice
6900 W Brown Deer Rd
Brown Deer,WI 53223-2106

Brandon S. Lefkowitz
24100 Southfield Road
Suite 203
Southfield, MI 48075
Southfield, MI 48075-2851

Convergent HC Recoveri
Attn: Bankruptcy Dept.
121 Ne Jefferson St Ste
Peoria,IL 61602-1256

Experian
Attn: Bankruptcy Dept.
PO Box 2002
Allen,TX 75013-2002

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia,PA 19101-7346

Milwaukee Water Works
Billing Dept.
841 N. Broadway
Milwaukee,WI 53202-3677

Short Term Financial LLC
Attn: Bankruptcy Dept.
880 Lee St Suite 302
Des Plaines,IL 60016-6487

State Collection Servi
Attn: Bankruptcy Dept.
2509 S Stoughton Rd
Madison,WI 53716-3314

The Bank of New York Mellon Trust Company, N
Gray & Associates, LLP
16345 W. Glendale Drive
New Berlin, WI 53151-2841

AmeriCash Loans of Wisconsin, L.L.C.
P.O. Box 184
Des Plaines, IL 60016-0003

Arthur Heitzer
Notice
633 W. Wisconsin Ave. Suite
Milwaukee,WI 53203-1918

Capital ONE BANK USA N
Attn: Bankruptcy Dept.
15000 Capital One Dr
Richmond,VA 23238-1119

Credit Acceptance
Bankruptcy Dept.
4590 East Broad Street
Columbus,OH 43213-1301

Froedtert Hospital
Bankruptcy Dept.
PO Box 9030
Menomonee Falls,WI 53052-9030

Law Office of Arthur Heitzer
Attn: Bankruptcy Dept.
633 W Wisconsin Ave # 1410
Milwaukee,WI 53203-1920

Ocwen Loan Servicing
Attn: Bankruptcy Dept.
12650 Ingenuity Dr
Orlando,FL 32826-2703

Short Term Financial, LLC
P.O. Box 184
Des Plaines, IL 60016-0003

The Bank of New York Mellon Trust Co.,NA
c/o Ocwen Loan Servicing, LLC
Attn: Bankruptcy Dept
PO Box 24605
West Palm Beach, FL 33416-4605

Wisconsin Department Of Revenue
P.O. Box 8901
Madison, WI 53708-8901

(p)AMERICOLLECT INC
PO BOX 2080
MANITOWOC WI 54221-2080

Aurora Advanced Healthcare
Bankruptcy Dept
PO Box 091700
Milwaukee,WI 53209-8700

Children's Hospital of Wisconsin
Bankruptcy Dept.
9000 W. Wisconsin Ave.
Milwaukee,WI 53226-4874

Equifax
Attn: Bankruptcy Dept.
PO Box 740241
Atlanta,GA 30374-0241

(p)GUARDIAN CREDIT UNION
11220 W OKLAHOMA AVE
WEST ALLIS WI 53227-3937

MILWAUKEE WATER WORKS
200 E WELLS ST
RM 800
MILWAUKEE WI 53202-3515

Office of the U. S. Trustee
517 East Wisconsin Ave.
Room 430
Milwaukee, WI 53202-4510

Speedy Loan
Atten: Bankruptcy
PO Box 26275
Wauwatosa,WI 53226-0275

Tmobile
C/O Enhanced Recovery CO L
8014 Bayberry Rd
Jacksonville,FL 32256-7412

Transunion
Attn: Bankruptcy Dept.
PO Box 1000
Chester,PA 19016-1000

U S DEPT OF ED/GSL/ATL
Attn: Bankruptcy Dept.
Po Box 4222
Iowa City,IA 52244

We Energies
Attn Bankruptcy Dept. RM A130
333 W Everett St
Milwaukee WI 53290-0002

Wheaton Franciscan Healthcare
801 South 60th Street, Suite 150
West Allis, WI 53214-3365

Wheaton Franciscan Med. Group
Bankruptcy Department
PO Box 68-9711
Milwaukee,WI 53268-0001

Wisconsin Acceptance
Bankruptcy Dept.
7676 N 76th St.
Milwaukee,WI 53223-4018

Wisconsin Department of Revenue
Attn: Special Procedures, MS 4-SPU
PO BOX 8901
Madison WI 53708-8901

Wisconsin Electric POW
Attn: Bankruptcy Dept.
231 W Michigan St # A130
Milwaukee,WI 53203-2918

Adrian Buckley Sr.
4836 N. 66th St.
Milwaukee, WI 53218-4032